

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**STEWART ABRAMSON and JAMES
EVERETT SHELTON, individually and on
behalf of a class of all persons and entities
similarly situated,**

CIVIL ACTION

Plaintiffs,

NO. 18-cv-615-RCM

v.

**AGENTRA, LLC, KAREN MARIE
EDWARDS, ANGELIC MARKETING
GROUP L.L.C., THERESA JONES and
MATTHEW JONES,**

Defendants.

**UNOPPOSED MOTION TO SET ASIDE DEFAULT
AS TO ANGELIC MARKETING GROUP L.L.C. AND MATTHEW JONES**

Defendants, Angelic Marking Group L.L.C. and Matthew Jones (collectively, the “Movants”), by and through their undersigned attorneys, hereby move this Honorable Court for an Order opening the default entered against them and in favor of Plaintiffs, Stewart Abramson and James Everett Shelton (the “Plaintiffs”) on or around May 15, 2019. In support of their Motion, the Movants aver as follows:

1. On or about April 9, 2019, the Plaintiffs filed a Second Amended Class Action Complaint against Movants (along with Agentra, LLC, Karen Marie Edwards and Theresa Jones), alleging violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* (“TCPA”).

2. The Movants deny any wrongdoing and deny that they have any liability for any acts and conduct under the TCPA.

3. Movants retained counsel on May 20, 2019. Movants' counsel is in the process of investigating the allegations and claims set forth in the Second Amended Class Action Complaint.

4. Movants' counsel immediately contacted Plaintiffs' counsel. Movants' counsel requested that Plaintiffs' counsel consent to the entry of an Order opening the judgment and providing Movants' with twenty (20) days to file a response to the Second Amended Class Action Complaint and Plaintiffs' counsel has consented to the request.

WHEREFORE, Movants, Angelic Marketing Group, L.L.C. and Matthew Jones, respectfully request that this Court open the Default and permit Movants twenty days to file a response to Plaintiffs' Second Amended Class Action Complaint.

Date: May 21, 2019

Respectfully submitted,

**COHEN SEGLIAS PALLAS GREENHALL &
FURMAN, PC**

/s/ James McNally

James McNally, Esq.

Pa. I.D. No. 78341

525 William Penn Place, Suite 3005

Pittsburgh, PA 15219

(412) 434-5530

jmcnally@cohenseglias.com

*Attorneys for Defendants, Angelic Marketing
Group, L.L.C., and Matthew Jones*

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**STEWART ABRAMSON and JAMES
EVERETT SHELTON, individually and on
behalf of a class of all persons and entities
similarly situated,**

CIVIL ACTION

Plaintiffs,

NO. 18-cv-615-RCM

v.

**AGENTRA, LLC, KAREN MARIE
EDWARDS, ANGELIC MARKETING
GROUP L.L.C., THERESA JONES and
MATTHEW JONES,**

Defendants.

CERTIFICATE OF SERVICE

I hereby certify on the 21st day of May, 2019, a true copy of the Unopposed Motion to Set Aside Default as to Angelic Marketing Group L.L.C. and Matthew Jones was served via the Court's ECF system on all parties set up to receive electronic notices and the following:

Anthony I. Paronich
99 High Street
Boston, MA 02110
anthony@paronichlaw.com
*Attorney for Stewart Abramson
and James Everett Shelton*

Clayton S. Morrow
Morrow & Artim, PC
304 Ross Street, 7th Floor
Pittsburgh, PA 15219
cmorrow@allconsumerlaw.com
Attorney for Stewart Abramson

Robert B. Cottington
Cohen & Grigsby, P.C.
625 Liberty Avenue
Pittsburgh, PA 15222
rcottington@cohenlaw.com
Attorney for Agentra, LLC

/s/ James McNally
James McNally